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**FILED**

AUG 18 2022

Clerk, U S District Court  
District Of Montana  
Billings

**ATTORNEY FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**JOMO KENYATTA JOHNNY  
HILL,**

**Defendant.**

**CR 22- 88 -BLG- SPW**

**INDICTMENT**

**CONSPIRACY TO POSSESS WITH  
INTENT TO DISTRIBUTE FENTANYL**

**(Count 1)**

**Title 21 U.S.C. § 846**

**(Penalty: Mandatory minimum five to 40  
years of imprisonment, \$5,000,000 fine, and  
at least four years of supervised release)**

**POSSESSION WITH INTENT TO  
DISTRIBUTE FENTANYL**

**(Count 2)**

**Title 21 U.S.C. § 841(a)(1)**

**Title 18 U.S.C. § 2**

**(Penalty: Mandatory minimum five to 40  
years of imprisonment, \$5,000,000 fine, and  
at least four years of supervised release)**

	<p><b>POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME</b>  <b>(Count 3)</b>  <b>Title 18 U.S.C. § 924(c)(1)(A)(i)</b>  <b>(Penalty: Mandatory minimum five years to life imprisonment, consecutive to any other sentence, \$250,000 fine, and five years of supervised release)</b></p> <p><b>PROHIBITED PERSON IN POSSESSION OF FIREARMS</b>  <b>(Count 4)</b>  <b>Title 18 U.S.C. § 922(g)(1)</b>  <b>(Penalty: Ten years of imprisonment, \$250,000 fine, and three years of supervised release)</b></p> <p><b>FORFEITURE</b>  <b>Title 21 U.S.C. § 853(a)(1) and (2)</b>  <b>Title 21 U.S.C. § 881(a)(11)</b>  <b>Title 18 U.S.C. § 924(d)</b></p> <p><b>TITLE 21 PENALTIES MAY BE ENHANCED BY PRIOR DRUG-RELATED FELONY CONVICTIONS</b></p>
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**THE GRAND JURY CHARGES:**

**COUNT 1**

On or about April 9, 2021, at Glendive and within Dawson County, in the State and District of Montana, the defendant, JOMO KENYATTA JOHNNY HILL, knowingly and unlawfully conspired and agreed with other persons, known and unknown to the Grand Jury, to possess with the intent to distribute, in violation of 21 U.S.C. § 841(a)(1), 40 grams or more of a mixture or substance containing a

detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 846.

#### COUNT 2

On or about April 9, 2021, at Glendive and within Dawson County, in the State and District of Montana, the defendant, JOMO KENYATTA JOHNNY HILL, knowingly and unlawfully possessed, with the intent to distribute, 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

#### COUNT 3

On or about April 9, 2021, at Glendive and within Dawson County, in the State and District of Montana, the defendant, JOMO KENYATTA JOHNNY HILL, knowingly possessed a firearm in furtherance of a drug trafficking crime that may be prosecuted in a court of the United States, namely conspiracy to possess with intent to distribute, and possession with intent to distribute fentanyl, as alleged in Counts 1 and 2 above, in violation of 18 U.S.C. § 924(c)(1)(A)(i).

#### COUNT 4

On or about April 9, 2021, at Glendive and within Dawson County, in the State and District of Montana, the defendant, JOMO KENYATTA JOHNNY HILL, having been convicted on or about April 5, 2001, of a crime punishable by

imprisonment for a term exceeding one year under the laws of the United States, knowingly possessed, in and affecting interstate commerce, firearms and ammunition, in violation of 18 U.S.C. § 922(g)(1).

#### FORFEITURE ALLEGATION

Upon conviction of either of the offenses set forth in Counts 1 and 2 of this indictment, the defendant, JOMO KENYATTA JOHNNY HILL, shall forfeit, pursuant to 21 U.S.C. § 853(a)(1) and (2), and 21 U.S.C. § 881(a)(11): (1) any property constituting and derived from any proceeds obtained, directly and indirectly, as a result of the commission of said offense; (2) any property used and intended to be used, in any manner and part, to commit, and facilitate the commission of, said offense; and (3) any firearm used and intended to be used to facilitate the transportation, sale, receipt, possession, and concealment of controlled substances and any proceeds traceable to such property.

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Upon conviction of either of the offenses set forth in Counts 3 and 4 of this indictment, the defendant, JOMO KENYATTA JOHNNY HILL, shall forfeit, pursuant to 18 U.S.C. § 924(d), any firearms and ammunition involved in any knowing violation of said offense.

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON

  
JESSE A. LASLOVICH  
United States Attorney

  
CYNDEE L. PETERSON  
Criminal Chief Assistant U.S. Attorney

Crim. Summons \_\_\_\_\_

Warrant: X \_\_\_\_\_

Bail: \_\_\_\_\_